

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CYNTHIA GEORGE,)
Plaintiff,)
v.)
KJPL RIVERWOOD, LLC, JPL)
DEVELOPMENT, LLC, and BACAR)
CONSTRUCTORS, INC.,)
Defendants.)

Civil Action No. 3:23-cv-00836

**MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL OF RECORD
FOR PLAINTIFF CYNTHIA GEORGE**

Comes now, the undersigned counsel for record for Plaintiff, Cynthia George, and pursuant to Local Rule 83.01(h) and Rule 1.16(a)(4) and the Model Rules of Professional Conduct of the American Bar Association, hereby respectfully requests permission to withdraw as counsel of record in the above-captioned case, and in its place, substitute M. Todd Sandahl, who shall henceforth serve as the counsel of record for Plaintiff, Cynthia George, in this matter. In support hereof, the undersigned counsel represents the following:

1. The request withdrawal is hereby submitted upon the collective agreement of Plaintiff, Cynthia George, the undersigned counsel, and M. Todd Sandahl;
2. M. Todd Sandahl previously filed a Notice of Appearance as counsel for Plaintiff, Cynthia George on November 1, 2023, and, as such, no other party will be prejudiced by undersigned counsel's withdrawal.

As such, this Court should issue an Order permitting the withdrawal of the undersigned, and substitute M. Todd Sandahl as counsel for Plaintiff, Cynthia George, as detailed herein.

Respectfully submitted,

/s/ Michelle Owens

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served via the Court's electronic filing system on the following:

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Dated: December 14, 2023.

/s/ *Michelle Owens*
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